IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SQUARE D COMPANY and SCHNEIDER ELECTRIC, S.A.,

Plaintiffs,

v.

CASE NO.: 07 C 6294

Page 1 of 8

ELECTRONIC SOLUTIONS, INC., and WILLIAM AMBROS,

Judge James B. Moran

Defendants.

AFFIDAVIT OF CHRISTOPHER T. SHEEAN

- I, Christopher T. Sheean, being duly sworn on oath, depose and state in support of Plaintiffs Motion to Open Discovery, Compel Production of Purchase and Sale Records and Award Sanctions:
- I am a partner at Wildman, Harrold, Allen & Dixon LLP, and have been retained to represent the Plaintiffs in this action. I have personal knowledge of the matters contained in this affidavit..
- 2. In conjunction with our representation of Plaintiffs in this action, I traveled to Plant City, Florida on April 30, 2008 to conduct an inspection of defendants' inventory bearing the trademarks Square D®, Scheider Electric®, Telemecanique®, or Merlin Gerin®.
- My travel costs for this trip were \$537.40. My expense report for the trip is attached hereto as Exhibit 1.
- 4. I spent 18.2 hours total time in preparing for the inspection, conducting the inspection, communicating with my client regarding the findings of the inspection, and preparing the instant motion. My billable rate is \$475, a rate that is consistent with a litigation partner of

comparable experience in Chicago, Illinois. The total amount for my fees for the inspection and the instant motion total \$8,645.00.

- 5. Mr. Jeff Miller of Schneider Electric traveled from Raleigh, N.C. and joined me for the inspection, based on his knowledge and experience with Telemecanique® Contactors.

 Mr. Miller's travel expenses were \$310.04. (See the May 14, 2008 email from Mr. Miller, attached as Exhibit 2).
- 6. Mr. James Renie also traveled from Raleigh, N.C. and accompanied me on the inspection, based on his knowledge and experience with circuit breakers and sensors. Mr. Renie's travel expenses for the inspection were \$320.45. (See the May 14, 2008 email from Mr. Renie detailing his expenses, attached as Exhibit 3).
- 7. I retained Verasys LLC to assist in the imaging and analysis of electronic records on the computers of Defendants. Mr. Jesus Peña of Verasys traveled from Miami, FL and accompanied me on the inspection. The fees and expenses for Verasys were \$2,271.50. (An invoice from Verasys for the work is attached as Exhibit 4).

Further affiant sayeth not. I affirm, under the penalties for perjury, that the foregoing representations are true.

Christopher T. Sheean

SUBSCRIBED AND SWORN TO before me this 14⁺⁶ day of May, 2008.

Notary Public

"OFFICIAL SEAL" BARBARA J BROZYNA

Notary Public, State of Illinois My Commission Expires Aug. 12, 2011

WILDMAN, HARROLD, ALLEN & DIXON Partner Reimbursement Report

Period Covered From:

Christopher T. Sheean

Name:

04/30/08

To: 04/30/08

Attorney Billing No.:

1402

		4/30	4/30	4/30	4/30	4/30	4/30	4/30	4/30	3			Date		
E		4/30 Alamo Rental Car	4/30 Whistle Stop, Tampa	4/30 HMSHost @ Tampa Airport	4/30 HMSHost @ Tampa Airport	4/30 Parking @ Midway Airport	4/30 Gold Coast @ Midway Airport S8895.088	4/30 mile)	Mileage (22 miles 2 50 5 per	City, FL inspection of ESI -	Square D - ESI Travel to Plant		Charge	Chent Name \ Description of Client/	
		S8895.088	S8895.088	S8895.088	S8895.088	S8895.088	S8895.088	S8895.088	880.088				Matter #	Client/	CLIENT
		47.42	5.72	2.29	2.14	17.00	6.72	11.11	445.00				Amount		CLIENT CHARGES
										7			Entertainment (2)		OFFICE
													Approval	Mgmt.	OFFICE CHARGES (1
													Other)(
													Entertainment (2)		
													Purchases	Asset	PPA
												C same	Other		

EXHIBIT 1

55	This signature affirms that all expenses listed \$ \$ \$ \$ Shows are related to the business activity of the	Purpose, what, where is required.	ADVANCES (date & amount):	unt):	REIMBURSEMENT DUE
Signature: \$ \$ \$ \$ \$	Signature: \$ \$ \$ This signature affirms that all expenses listed \$ \$ \$ \$		ADVANCES (date & amou	unt):	
\$	This signature affirms that all expenses listed \$ \$ \$ \$ above are related to the business activity of the	Signature:	69	€5	8
	This signature affirms that all expenses listed above are related to the business activity of the		S	€A	59

COLUMN TOTALS

Management Committee approval required for any travel, gifts, contributions and seminars

\$537.40

\$0.00

\$0.00

\$0.00

Less Total Advances

\$0.00

\$0.00 TOTAL

\$0.00

BEFORE turning the expense report in to Accounting.

Documentation of entertainment expense including meals (who, business connection, business

charged to the Office rather than PPA. If you are submitting an expenditure of this type, you must have the Director of Administration indicate approval by initialing the designated column.

Date

Doc. # 1834364

Client Name \ Description of Client/

CLIENT CHARGES

OFFICE CHARGES (1)

Mgmt. Approval

Other

Entertainment (2)

Asset Purchases

Other

PPA

Charge

Matter #

Amount

Entertainment (2)

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Sheean, Christopher

From: jeff-raleigh.miller@us.schneider-electric.com

Sent: Wednesday, May 14, 2008 8:36 AM

To: Sheean, Christopher **Subject:** Re: ESI Inspection



Chris,

Mine was \$298.04, but add \$12.00 to that for a airline reporting charge so the total is \$310.04.

(Embedded image moved to file: pic32365.jpg)

Regards, Jeff

"Sheean, Christopher" <sheean@wildman.com>

To

05/13/2008 05:30 PM <jeff-raleigh.miller@us.schneider-

electric.com>

CC

<jim.renie@us.schneider-electric.com>,

"Jesus

Pena" <jpena@dynasite.com>

Subject

ESI Inspection

Jeff,

Could you please send me the total amount of your travel expenses for the inspection?

Thanks,

Chris

Christopher T. Sheean Wildman Harrold Allen & Dixon LLP 225 W. Wacker Drive

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Suite 2800

Chicago, Illinois 60606

T: (312) 201-2997 F: (312) 416-4659 sheean@wildman.com

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This	email	has	heen	scanned	for	SPAM	content	and	Viruses	hv	the	MessageL	ahs	Email
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Secur	rity Sy	yster	n.											

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From: jim.renie@us.schneider-electric.com
Sent: Wednesday, May 14, 2008 7:01 AM
To: Sheean, Christopher

Subject: Re: ESI/Square D

Jim Renie - ER00283246 (submitted to Tracy Garner)

Airfare - \$255.00

Travel Agency Fee - \$12.00

Parking - \$10.00

Lunch - \$27.29 Mileage - \$16.16

· .

Total - \$320.45

James C Renie

Sales and Marketing Alignment

Automation & Control - Schneider Electric

8001 Knightdale Blvd

919-266-8608 - Office

919-696-3591 - Cell

jim.renie@us.schneider-electric.com

AOL Instant Messenger - JCRENIE



66 West Flagler Suite 401 Miami, FL 33130

Invoice

Date	Invoice #
5/14/2008	3332

Bill To	
Wildman Harrold LLP Brian Lewis 225 W. Wache Dr. Suite 3000 Chicago, Illinois 60606	

			Tax ID # 16-1667634	Terms	P.O. No.	Project
				Due on receipt	Square D	W07-06-0742
Quantity			Description		Rate	Amount
	1	City JP- May 7, 2008:	8: Forensic imaging, verification Research computer. Files access ents related to ESI, Source Auto t.	s dated verification.	225.00 225.00	1,800.00 225.00
		SUBTOTAL Administrative Fe	ees @6%		6.00%	2,025.00 121.50
		One 240GB (Hard Tax	d Disk Storage)		125.00 7.00%	125.00 0.00
				Т	otal	\$2,271.50

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305-373-8488	305-373-8489	www.verasysllc.com